

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

NEW ENGLAND CARPENTERS HEALTH  
BENEFITS FUND, PIRELLI ARMSTRONG  
RETIREE MEDICAL BENEFITS TRUST,  
TEAMSTERS HEALTH & WELFARE FUND  
OF PHILADELPHIA AND VICINITY,  
PHILADELPHIA FEDERATION OF  
TEACHERS HEALTH AND WELFARE FUND,  
DISTRICT COUNCIL 37, AFSCME - HEALTH  
& SECURITY PLAN, JUNE SWAN,  
MAUREEN COWIE and BERNARD GORTER,

Plaintiffs,

v.

FIRST DATABANK, INC., a Missouri  
corporation, and McKESSON CORPORATION,  
a Delaware corporation,

Defendants.

Civil Action: 1:05-CV-11148-PBS

Judge Patti B. Saris

**ERRATA TO EXPERT REPORT OF ROBERT D. WILLIG IN SUPPORT  
OF DEFENDANT MCKESSON CORPORATION'S MEMORANDUM IN  
OPPOSITION TO CLASS CERTIFICATION**

**Footnotes to Expert Report:**

Footnote 15 (excerpted) currently reads:

Harvard Pilgrim, Humana, and Select Health are all examples of large PBMs that negotiate directly with manufacturers for drug rebates.

Footnote 15 (excerpted) should read:

Harvard Pilgrim, Humana, and Select Health are all examples of large TPPs that negotiate directly with manufacturers for drug rebates.

Footnote 89 (excerpted) currently reads:

Dr. Hartman recognized the sophistication of PBMs in his December 2004 Declaration in the AWP MDL, Attachment C, p. C11 . . . .

Footnote 89 (excerpted) should read:

Dr. Hartman recognized the sophistication of PBMs in his September 2004 Declaration in the AWP MDL, Attachment C, p. 11 . . . .

Footnote 109 currently reads:

MHS A\_0005018.

Footnote 109 should read:

MHS A\_0005018-5033 at MHS A\_0005024.

Footnote 118 currently reads:

MHS A\_0005173-5 at MHS A\_0005172.

Footnote 118 should read:

MHS A\_0005173-5.

Respectfully submitted,

McKesson Corporation

By its attorneys:

/s/ Lori A. Schechter

Melvin R. Goldman (*pro hac vice*)

Lori A. Schechter (*pro hac vice*)

Paul Flum (*pro hac vice*)

Tiffany Cheung (*pro hac vice*)

Morrison & Foerster LLP

425 Market Street

San Francisco, CA 94105-2482

tel. 415-268-7000

fax 415-268-7522

John Kiernan

Nicole Johnson

Bonner Kiernan Trebach & Crociata

One Liberty Square

Boston, MA 02109

Telephone: (617) 426-3900

Facsimile: (617) 426-0380

Dated: March 15, 2007

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on March 15, 2007.

/s/ Lori A. Schechter

Lori A. Schechter